

# COPY

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

IN THE MATTER OF: )

ILLINOIS COMMERCE COMMISSION, )

On Its Own Motion, )

vs. )

No. 01-0707

THE PEOPLES GAS, LIGHT AND COKE )  
COMPANY, )

Reconciliation of revenues )  
collected under gas adjustment )  
charges with actual costs )  
prudently incurred. )

CHIEF CLERK'S OFFICE

2004 DEC -9 A 9 44

ILLINOIS  
COMMERCE COMMISSION

The Discovery Deposition of WILLIAM MORROW,  
taken under oath on the 8th day of December 2004, at  
Suite N-901, 160 North LaSalle Street, Chicago,  
Illinois, pursuant to the Rules of the Supreme Court  
of Illinois and the Code of Civil Procedure, before  
Kathleen E. Maloney, a notary public in and for the  
County of Cook and State of Illinois, pursuant to  
notice.

APPEARANCES:

MR. SEAN R. BRADY  
160 North LaSalle Street, Suite C-800  
Chicago, Illinois 60601  
for Staff of the ICC;

1 Q. My mistake. I thought you had meant other  
2 components that would have been outside the terms  
3 that were in the agreement.

4 A. No. No. It all would have been within the  
5 agreement.

6 Q. Okay. Do you recall the review of any  
7 economic studies by the Peoples team?

8 A. No. I don't recall any.

9 Q. Was there a reason why an economic study --  
10 do you know if an economic study was -- let me  
11 rephrase that.

12 Did the Peoples team ask for an economic  
13 study to be performed?

14 A. Did the Peoples team ask? Or did you ask  
15 did the Peoples team perform? I'm not sure what you  
16 mean.

17 Q. Did the Peoples team ask for someone within  
18 the Peoples organization to perform an economic  
19 analysis?

20 A. I would not -- not to my knowledge. The  
21 Peoples team negotiating was the gas supply group,  
22 and if they felt that an evaluation was appropriate,

1 they would have performed the evaluation or  
2 analysis.

3 Q. And who were the -- is it the gas supply  
4 team?

5 A. Right.

6 Q. Who do you have in mind when you say that?  
7 What people?

8 A. It's no different than what we talked about  
9 previously, gas supply division was headed by  
10 Raleigh DeLara, as director of the group, and  
11 probably the key person for administration, gas  
12 supply administration was Dave Ware.

13 Q. And let me ask what was your role and  
14 responsibilities, if there were any, within that --  
15 the Peoples team?

16 A. Well, the Peoples team that I just -- and  
17 there were certainly others than the two I  
18 mentioned.

19 Certainly they had support people, other  
20 day-to-day operating people, attorneys, that would  
21 have helped them in that process. My role would  
22 have been I would receive some -- depending on the

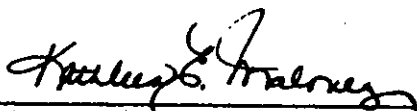
1 STATE OF ILLINOIS )  
2 ) SS:  
3 COUNTY OF COOK )

4 Kathleen E. Maloney, License  
5 No. 084-003235, being first duly sworn, on oath says  
6 that she is a Certified Shorthand Reporter, that she  
7 reported in shorthand the testimony given at the  
8 taking of said deposition, and that the foregoing is  
9 a true and correct transcript of her shorthand notes  
10 so taken as aforesaid, and contains all the  
11 testimony given by WILLIAM MORROW at said  
12 deposition.  
13

14 And further, that she is not connected by  
15 blood or marriage with any of the parties to this  
16 action, nor is she a relative or employee or  
17 attorney or counsel of any of the parties, or  
18 financially interested directly or indirectly in the  
19 matter in controversy.  
20

21  
22 That the preceding deposition shall be read

1 by said deponent, and any and all corrections which  
2 the deponent desires to make shall be duly made by  
3 the deponent on the enclosed errata sheet(s),  
4 indicating page and line to be corrected, and that  
5 the explanation, if any, given by the deponent for  
6 said corrections, shall be thereon noted.

7  
8 

Certified Shorthand Reporter  
No. 084-003235

10  
11 Subscribed and sworn to  
12 before me this 9<sup>th</sup> day  
of December 2004.

13   
14 Notary Public

